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November 26, 2021

Robert A. Meister
Of Counsel

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: 1:20 CV 03120 (PAE)
Lyons v New York Life Insurance Company

Dear Judge Engelmayer:

I represent Plaintiff Lorraine Lyons ("Plaintiff") in the above-referenced action and am writing pursuant to Rule 4(B)(2) of Your Honor's Individual Rules of Practice, Federal Rules of Civil Procedure Rule 5.2(a), and Paragraphs 1, 2, 3, 5, 6, and 8 of the Parties' so-ordered Confidentiality Stipulation and Protective Order (ECF No. 28).

Plaintiff respectfully requests permission to redact certain/or all information from the public filing of, and to file unredacted copies under seal of, the following documents in opposition to Defendant New York Life Insurance Company's Motion For Summary Judgment: (i) Plaintiff's Declaration Opposing Summary Judgment dated November 19, 2021; (ii) Plaintiff's Statement of Additional Material Facts As To Which There Is No Genuine Issue Of Material Fact; (iii) Declaration of Steve Buell in Opposition to Motion for Summary Judgment dated November 18, 2021; Exhibits #2, #7, #8, #9, #15, #16, #17, 24, 26 to the Declaration Of Armand Zappa In Opposition To Motion For Summary Judgment dated November 19, 2021.

In support of this request, Plaintiff states that the above referenced documents each contain information from documents, and/or are copies of documents marked Confidential during in accordance with the Parties' so-ordered Confidentiality Stipulation and Protective Order (ECF No. 28), including in one instance the date of birth of Plaintiff. All of the redacted or other information in the documents filed under seal are material facts that support Plaintiff's Opposition to Defendant's Motion for Summary Judgment.

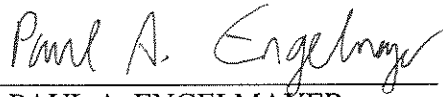
Accordingly, Plaintiff respectfully requests that the Court grant its request to file the unredacted documents referenced above under seal and to redact any portions of Declarations, Statements or Exhibits that disclose material designated as Confidential under the Parties' so-ordered Confidentiality Stipulation and Protective Order (ECF No. 28) on the public docket.

I thank the Court for its attention to this matter.

Respectfully yours,

/s/Arnold Pedowitz
Arnold Pedowitz

Granted. The unredacted documents at docket entries 106-143 and 150-155 are to remain under seal. The Clerk of the Court is respectfully directed to close the motion pending at docket 89. SO ORDERED.

A handwritten signature in cursive script, reading "Paul A. Engelmayer".

PAUL A. ENGELMAYER
United States District Judge
12/1/21